

FILED

JUL 11 2007

Phil Lombardi, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JESSE NELSON

)

Plaintiff,

)

vs.

)

HELMERICH & PAYNE Co.

)

07 CV - 385 TCK - SAJ

Case No. _____

JURY TRIAL DEMANDED

Defendant.

)

COMPLAINT

Comes now the Plaintiff, and for his Cause of Action against the Defendant, and alleges and states:

1. That the Plaintiff was an employee of the Defendant, and was an employee at all times relevant to his cause of action, and the Defendant was an employer at all times, and all acts or omissions took place in the Northern District, thus jurisdiction and venue are present.

2. That the Plaintiff is Black

3. That within the limitations period next preceding the filing of this action, the Defendant discriminated against the Plaintiff, *inter alia*,

- a. by engaging in conduct against the Plaintiff because of his race, thus creating a hostile working environment.
- b. by discriminating against Plaintiff in his other wages, hours and working conditions, and

Recd 8/11/07
SJP

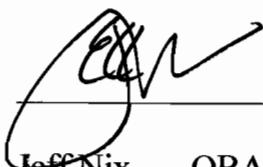
4. That the Plaintiff has exhausted all of his administrative remedies, internal and external, and has received a right-to-sue letter, within the past 90-days.

5. That the Plaintiff has been damaged in excess of \$75,000.00, in actual damages.

6. That the acts or omissions of the Defendant were wilful, wanton and malicious, giving rise to a claim for punitive damages, for which Plaintiff also prays, in excess of \$75,000.00.

WHEREFOR Plaintiff prays for a judgement in excess of \$75,000.00 actual, and in excess of \$75,000.00 punitive, for costs of this action including a reasonable attorney's fee, and for all other relief, at law or in equity.

Respectfully submitted,



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